

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

**GRAHAM CHASE ROBINSON**

*Plaintiff,*

v.

**ROBERT DE NIRO and  
CANAL PRODUCTIONS, INC.,**

*Defendants.*

**Case No. 1:19-cv-09156-LJL-KHP**

**NOTICE OF PLAINTIFF'S MOTION TO CERTIFY THE COURT'S  
SUMMARY JUDGMENT ORDER FOR INTERLOCUTORY REVIEW  
PURSUANT TO 28 U.S.C. § 1292(b)**

PLEASE TAKE NOTICE THAT, upon the pleadings and prior proceedings had herein, Plaintiff Graham Chase Robinson shall move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at such date and time as the Court may direct, for relief amending the Court's Opinion and Order (Dkt. No. 382) to certify one or more questions for interlocutory review pursuant to 28 U.S.C. § 1292(b).

In support of this Motion, Plaintiff submits the Memorandum of Law filed herewith.

Dated: June 15, 2023

Respectfully submitted,

/s/ Melinda Koster

Melinda Koster (MK-1384)  
Alexandra Harwin (AH-3111)  
David Sanford (5695671)  
Jeremy Heisler (JH-0145)  
Kate MacMullin (5693882)  
SANFORD HEISLER SHARP, LLP  
1350 Avenue of the Americas, 31st Floor  
New York, New York 10019

Telephone: (646) 402-5650  
Facsimile: (646) 402-5651  
mkoster@sanfordheisler.com  
aharwin@sanfordheisler.com  
dsanford@sanfordheisler.com  
jheisler@sanfordheisler.com  
kmacmullin@sanfordheisler.com

Michael Lockman (5485156)  
SANFORD HEISLER SHARP, LLP  
611 Commerce Street, Suite 3100  
Nashville, Tennessee 37203  
Telephone: (615) 434-7000  
Facsimile: (615) 434-7020  
mlockman@sanfordheisler.com

*Counsel for Plaintiff Graham Chase Robinson*